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basic concept of the present invention -- namely, a concrete curing blanket having an exposed metallic foil that provides lateral heat distribution.

The Examiner asserts that it would somehow be obvious to combine Fletcher with Handwerker. Applicant respectfully disagrees. Handwerker discloses a concrete curing blanket used in rigorous environment of the construction industry. On the other hand, Fletcher discloses an insulating material for:

[I]ndoor and outdoor clothing; footwear and linings for footwear; sleeping bags and linings and covers for sleeping bags; tents and groundsheets for tents; and hypothermia prevention blankets and other medical blankets and clothing.

The applications for the Fletcher material are relatively mild in comparison to the construction industry. It is respectfully submitted that a skilled artisan confronting a problem in the construction industry would not turn to the Fletcher material for a solution. Further, neither reference teaches or suggests that it be combined with, or is combinable with, the other reference. In fact, the idea that a concrete curing blanket would be used to make a sleeping bag, or that the Fletcher material would be used to make a concrete curing blanket would simply not be considered by an artisan in either field. It is respectfully submitted that the only motivation for combining the two references is an improper attempt to create a hindsight reconstruction of the present invention, using the present specification as a roadmap. It therefore is respectfully submitted that such a combination is improper.

Further, even if combined, Handwerker and Fletcher do not disclose, teach, or suggest the present invention. The Fletcher blanket includes an insulating textile material 1 and a "reflective foil or film" 2 held together by an adhesive film 3. The Fletcher "foil" is a metal

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foil coated with plastic. For example, on page 2, at lines 25-30, Fletcher states that the relevant layer is a "plastics-coated [sic] conductive metal film"; and on page 3, at lines 2-5, Fletcher describes a further preferred embodiment wherein "the reflective film comprises a very thin layer of aluminum coated, on both sides, with a polyester/mylar/polythene [sic] plastics [sic] film." Fletcher, therefore, teaches an exposed **plastic** layer instead of an exposed **metallic** layer. Accordingly, Fletcher adds nothing to Handwerker, which also discloses a metal layer but not an exposed metal foil.

Fletcher not only discloses a blanket having an exposed plastic layer, it teaches away from a blanket having an exposed metallic layer. On page 4, lines 30-33, Fletcher admittedly suggests that a reflective layer might comprise a polyester Mylar film having a thin aluminum coating. However, the stated object of Fletcher is to provide a heat-insulating material that is "resilient, re-usable and washable". Page 2, lines 21-24. However, on page 2, lines 5-8, Fletcher states that reflective foils with exposed metal cannot be washed in a normal manner very efficiently or without damage. Therefore, any material having an exposed metal surface would be inconsistent with the stated goals and objects of Fletcher.

Further, Fletcher (like Handwerker) totally fails to recognize, let alone address, lateral heat conduction. Fletcher teaches that the most important optical property of the film is its reflectivity in infrared range, so that the foil will return the maximum amount of heat emitted from the object to the object itself. Page 5, lines 2-7. Fletcher is focused on keeping the user of the blanket as warm as possible. In stark contrast to Fletcher (and Handwerker), the present invention recognizes the benefits of lateral heat conduction and discloses a structure for realizing

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lateral heat conduction.

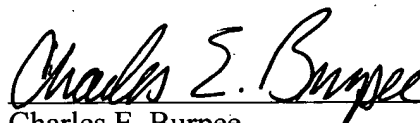
In view of (1) the non-combinability of Handwerker and Fletcher and (2) the failure of any such combination to disclose, teach, or suggest the present invention as defined in the remaining claims, it is respectfully submitted that the rejection under 35 U.S.C. 103(a) is improper and/or overcome, and therefore should be withdrawn.

In conclusion, it is respectfully submitted that the present application is fully in condition for allowance. A notice to that effect is earnestly and respectfully requested.

Respectfully submitted,

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